

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

CHRISTIE ANDREWS,

Plaintiff,

v.

TRI STAR SPORTS AND ENTERTAINMENT
GROUP, INC.

Defendant.

Case No. 3:21-cv-00526

Judge Eli J. Richardson
Magistrate Judge Jeffery S. Frenseley

JURY DEMAND

DECLARATION OF ELISE ST. GERMAIN

I declare state under penalty of perjury that the below is true and correct.

1. I am over eighteen years of age.
2. I am a former employee of Tri Star Sports and Entertainment Group, Inc. ("TriStar").
3. I was employed by TriStar starting April 2017 and ending January 2021.
4. In 2020 I worked in TriStar's Nashville office.
5. In 2020 I was on a TriStar Business management team.
6. I reported directly to Peggy Stephens.
7. In 2020 I held the job title of Account Manager and I had direct reports.
8. In 2020 I recall Ambra Baker ("Baker") being a Team Coordinator on my team.
9. In 2020 I recall Christie Andrews ("Andrews") was also Team Coordinator in the Nashville office.
10. During my employment I was aware that Andrews had asthma.

11. During my employment I recall seeing Andrews' inhaler while at work on several occasions.
12. I believe it was common knowledge in the office that Andrews had asthma
13. I recall that prior to the pandemic that TriStar employees would participate in meetings via phone or videoconference.
14. I recall that after the pandemic that I routinely participated in team meetings TriStar employees would participate in meetings via phone or videoconference.
15. I recall TriStar used videoconferencing software where the camera zoomed in on whoever was speaking.
16. I recall regularly corroborating with other TriStar employees who were not physically present in the Nashville office.
17. In person meetings with clients were suspended during the pandemic.
18. I recall Ambra Baker working from home one day a week for numerous weeks in 2020.
19. Based on my tenure at TriStar it is my opinion that face-to-face interaction was not essential to coordinating work with Team Coordinators.
20. I do not believe allowing Team Coordinator to work from would would interfere with the quality of their work.
21. I recall meetings involving client financial information that were conducted with individuals who were physically in the Nashville office and individuals physically in the Los Angeles office.
22. I believe Team Coordinators could perform their job duties from home because other employees performed their job duties remotely, including employees who dealt with sensitive client financial information.

23. TriStar permitted members of Business Management team to remotely access the client confidential financial information on a regular basis.

24. All documents and information were available electronically.

25. TriStar allowed members Business Management Team to participate meetings remotely prior to the pandemic.

26. I recall TriStar maintaining a job posting for a team coordinator position on my team in March 20, 2020.

27. I believe Olivia Burns was working at the front desk and was transitioned into a Team Coordinator position after Christie was fired.

28. There was no lack of work in March 20, 2020.

29. I recall Taylor had the exterior of the Nashville office painted professionally in 2020 and finding it offensive because of the recent layoffs.

I declare state under penalty of perjury that the foregoing is true and correct. Executed on



Elise St Germain (Dec 13, 2022 10:11 CST)

Signature

Dec 13, 2022

Date

12 Declaration of Elise St. Germain Draft" History

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